

RESPONSES TO PUBLIC COMMENTS RECEIVED TO DRAFT PERKINS IV STATE PLAN

Planning, Coordination, and Collaboration

Comments with regard to a lack of an opportunity for input into the development of the Missouri State Plan primarily at the postsecondary level.

Response: The Division recognizes that there could have been a more concerted effort to gather input from interested stakeholders during the development of the Missouri State Plan. As stated in the Missouri State Plan, the Division consulted with a number of groups and individuals during the development of both the transition plan and the five-year state plan. The Division targeted areas of the plan for consultation that it felt were most in need of direct input from interested parties. These targeted areas included:

- Tech Prep
- Accountability
- Programs of Study
- Postsecondary Participation in the One-Stop System
- Special Populations
- Business and Industry

As implementation of the Missouri State Plan begins, the Division will continue to work with the appropriate stakeholders to ensure that input is received to assist in specific implementation strategies such as programs of study, technical skill attainment, and CTE funding, to name a few.

Program Administration

Comments with regard to the development and implementation of programs of study.

Response: As stated in the Missouri State Plan, each program of study developed at the local level will include a three-part curriculum framework built around a 4+2(+2) articulation model. The Missouri State Plan lists the secondary, postsecondary, and additional criteria that each eligible recipient will use as a guideline for development and implementation of programs of study.

In order to assist the state in developing an implementation plan for programs of study, an advisory committee was formed which consists of secondary and postsecondary representatives. The committee was represented by each community college that hosts Tech Prep in their district. Each region of the Missouri Council of Career and Technical Administrators was represented by their respective chair. In addition, comprehensive high schools were represented. The first meeting of the advisory committee was held on December 17, 2007. The advisory committee members will be consulted as specific implementation plans are developed. The advisory committee will have adequate time to provide feedback into the process.

Comments with regard to Professional Development.

Response: The Division sponsors professional development activities and events based on feedback they receive from teachers and administrators. Professional development activities and

events are also aligned with initiatives in the Perkins legislation as well as other state and local initiatives. The Division evaluates all activities and events to ensure that they are making maximum utilization of all funds that are available for professional development.

The Division recognizes that postsecondary teachers have unique professional development needs separate from secondary teachers. The Division will work closely with postsecondary leaders to assist the Division in identifying professional development activities and events that best meet their needs.

Comments with regard to the lack of postsecondary transition strategies.

Response: Information regarding the P-20 Council and the Curriculum Alignment Initiative (CAI) will be included in the Program Administration section of the Missouri State Plan.

Comments with regard to articulation agreements.

Response: The Division recognizes that the number of students taking advantage of articulation agreements and/or dual credit arrangements is relatively low. The Division supports any local efforts to increase student transition from secondary to postsecondary education. These efforts must be carried out in accordance with the *Graduation Requirements for Students in Missouri Public Schools* handbook which can be found on the DESE website at: http://www.dese.mo.gov/divimprove/sia/Graduation_Handbook_2010.pdf.

Comments with regard to inconsistencies in the number of recognized program areas.

Response: The Missouri State Plan was reviewed for the inconsistencies received during the comment period. The appropriate modifications were made to the Missouri State Plan.

Comments with regard to the negotiations on performance indicators during the transition year.

Response: The Division was not required to negotiate with local Perkins grant recipients during the transition year. Secondary Perkins grant recipients are only required to report on 1S1, 1S2, 4S1 during the transition year. For these three indicators, the performance levels were already established under No Child Left Behind and no negotiations were necessary.

Postsecondary grant recipients were not required to report on any accountability indicators during the transition year. Therefore, no negotiations were necessary.

Comments with regard to suggested implementation strategies to meet various requirements of the State Plan.

Response: Several comments were received with suggested strategies for implementing various portions of the State Plan. Because these strategies would require additional input from all stakeholders, these comments will be taken into consideration as full implementation of the State Plan begins.

Comments with regard to the Missouri Career Prep Certificate.

Response: The authorizing statute for what is now known as the Career Preparation Certificate, Chapter 169 Section 160.575 RSMo, established a voluntary, ready-to-work endorsement program of individual student achievement. The authorizing statute did not include a

corresponding fiscal appropriation. Without specific funding the statewide advisory committee developed a planning process which included an alignment of several assessments to the academic and work readiness components identified by the committee. Local schools interested in providing a career preparation certificate are encouraged to establish an advisory committee of community stakeholders. This committee would recommend appropriate assessments which could include the ACT WorkKeys, the Missouri Career Readiness Certificate and other assessments.

Comments with regard to data collection.

Response: The Department has developed the Missouri Student Identification System (MOSIS) to assist in student data collection. The Department has been working with schools and their data vendors to assist in the uploading of each school's student data. Although most of the data reported will eventually be collected through MOSIS, there may be a necessity to collect data using other methods, where appropriate.

Special Populations

Comments with regard to postsecondary input on the Special Populations section of the State Plan.

Response: A postsecondary representative provided input on the Special Populations section as it was being developed. In addition, the Special Populations section was shared with appropriate staff at the Vocational Rehabilitation state office for review and comment.

Administration and Evaluation

Comments with regard to technical skill attainment.

Response: The Division omitted information on technical skill attainment in the January 9th draft of the Missouri State Plan. Information regarding technical skill attainment has been added in the Administration and Evaluation section of the Missouri State Plan.

Tech Prep Programs

Comments with regard to Tech Prep Scope of Work.

Response: The State Tech Prep director and the 12 Tech Prep coordinators develop an annual scope of work. The decision to have the Tech Prep coordinators facilitate the development of programs of study was based on the specific language in Perkins IV which states that Tech Prep programs must include all components of a program of study.

Financial Requirements

Comments with regard to sufficient size, scope, and quality.

Response: The decision to require 4 of 7 approved programs to qualify as sufficient size and scope has been in place for many years. The decision to continue with this in Perkins IV was based on minimal objections from this rule in Perkins III and an overall acceptance for continuing with this rule in Perkins IV.

Comments with regard to split of funds between secondary and postsecondary.

Response: Included in the Perkins legislation is a requirement that each eligible agency describe in its state plan the split of funds between secondary and postsecondary and also provide the rationale for this split of funds. In the previous Missouri State Plan (Perkins III), the Division utilized enrollment numbers to arrive at the 70/30 split between secondary and postsecondary. Thus, for the Perkins IV State Plan, the Division again will use enrollment numbers to determine the split of funds. For this determination, the Division chooses to use enrollment numbers over a six-year period (which was the life of Perkins III).

For the transition year, the result of the six-year average was a 72/28 split between secondary and postsecondary. This new funding split took effect in Fiscal Year 2008 and impacted the allocations for the Perkins grants beginning July 1, 2007.

For year one of the Missouri State Plan, the result of the six-year average will again be a 72/28 split between secondary and postsecondary. Thus, the current funding split will continue to be in effect for Fiscal Year 2009 and impact the allocations for the Perkins grants beginning July 1, 2008.

As indicated in the Missouri State Plan, the funding distribution percentage will be reviewed each fiscal year, and if necessary, the Division will change the percentages to reflect the current enrollment rates.

General Comments

Response: All relevant comments were taken into consideration when making final edits to the Missouri State Plan document.